

# ALLIS COMMUNICATIONS OPERATING ASSOCIATES, LP

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FCC Mail Room

April 4, 2017

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: EB Docket No. 06-36

Dear Ms. Dortch:

This statement is submitted on behalf of Allis Communications Operating Associates, LP ("Company") in compliance with 47 CFR 64.2009(e) together with a Compliance Certificate executed by an officer of the Company.

The Company provides internet and telephone services to 50 tenants in 6 buildings located in a building complex in West Allis, Wisconsin. The Company's activities are managed by Whitnall Summit Co. II, LLC whose employees are Denise Oehldrich and Patrick McHugh, the only persons who have direct access to confidential and proprietary information of the Company's customers.

For billing purposes the customer's calling records are downloaded to a server operated by E2E Business Services.

The procedures utilized by Whitnall Summit Co. II, LLC require that no information relating to a customer be released to anyone other than the customer or a person or entity specifically authorized, in writing, by the customer. Whitnall Summit Co. II, LLC is required to advise me as to any contacts with data brokers or complaints from customers. Whitnall Summit Co. II, LLC has advised me that it has had no contacts of any kind from, to or with data brokers and there have been no customer complaints received during 2016 concerning the unauthorized release of customer proprietary network information.

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(505) 992-5100 GARFIELD STREET, SANTA FE, NEW MEXICO 87501 FAX (505) 982-7813

The procedures utilized by E2E Business Services are as follows: After the customers' calling records are downloaded to its server and the customer invoices are processed, the data is compressed, backed up, and removed from the server. It is then stored in a locked safe with access limited to William Law, the owner of E2E Business Services. E2E Business Services is required to advise Whitnall Summit Co. II, LLC as to any contacts with data brokers or complaints from customers. E2E Business Services has advised Whitnall Summit Co. II, LLC that it has had no contacts of any kind from, to or with data brokers and there have been no customer complaints received by it during 2015 concerning the unauthorized release of customer proprietary network information.

Please let us know if you require any further information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 4, 2017

Allis Communications Operating Associates, LP  
By: BGK Communications LLC, General Partner

By:  \_\_\_\_\_

Paul S. Gerwin  
Executive Vice President

cc: Federal Communications Commission  
Enforcement Bureau  
Telecommunications Consumers Division  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554  
(2 copies)

Best Copy and Printing, Inc.  
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Washington, D.C. 20554  
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**CERTIFICATION PURSUANT TO 47 CFR 64.2009(e)**

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The undersigned, Executive Vice President of Allis Communications Operating Associates, LP (the "Company") hereby certifies that, I have personal knowledge that the Company has established operating procedures that are adequate to insure compliance with the rules provided in 47 CFR 64.2001 et. seq. These operating procedures were in effect during the entire calendar year of 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 4, 2017.

Allis Communications Operating Associates, LP  
By: BGK Communications, LLC

By: \_\_\_\_\_

Paul S. Gerwin  
Executive Vice President